

STUART F. DELERY
Assistant Attorney General
ELIZABETH J. SHAPIRO
Deputy Branch Director
Federal Programs Branch
KATHRYN C. DAVIS (DC Bar #985055)
Trial Attorney
Federal Programs Branch
U.S. Department of Justice, Civil Division
20 Massachusetts Avenue, N.W., Room 6130
Washington, DC 20530
Tel.: (202)616-8298
Fax: (202)616-8460
Email: Kathryn.C.Davis@usdoj.gov
Counsel for Defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ELECTRONIC FRONTIER FOUNDATION,)
Plaintiff,) Case No.: 4:09-cv-03351-SBA
v.)
CENTRAL INTELLIGENCE AGENCY, *et al.*,)
Defendants.)
Stipulation)
No hearing requested)

The parties to this action, through their undersigned counsel, have conferred and have reached an agreement with respect to modification of the current deadlines, as set forth in the Court's Order of December 20, 2013 [ECF No. 84], to comply with the Court's Order of September 30, 2013 [ECF No. 81].

Pursuant to this stipulation, the parties agree to modification of the current deadlines to comply with the Court's Order of September 30, 2013, as follows:

1. Defendants the Department of Homeland Security, the Department of Defense, the National Security Agency, the Department of Justice, and the Office of the Director of National Intelligence shall release to Plaintiff the information that the Court has not determined

was properly withheld or serve Plaintiff with satisfactory supplemental *Vaughn* indices and declarations by no later than March 21, 2014.

2. In the event the parties are unable to resolve their disputes regarding any withheld information, the parties must submit the stipulation required by the Court's Order of September 30, 2013, by no later than April 21, 2014.

Dated: February 14, 2014

Respectfully submitted,

/s/ Kathryn C. Davis
KATHRYN C. DAVIS (DC Bar #985055)
Counsel for Defendants

/s/ Jennifer Lynch
JENNIFER LYNCH (SBN 240701)
Counsel for Plaintiff

DECLARATION PURSUANT TO L.R. 5.1

I, Kathryn C. Davis, hereby declare that I have obtained Jennifer Lynch's concurrence in the filing of this document.

Executed at Washington, D.C. this 14th day of February, 2014.

* * * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 2/19/2014

Sandra B. Armstrong
The Honorable SANDRA S. ARMSTRONG
United States District Judge